



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

**Katherine M. Bolger**  
212.489.8230 tel  
212.489.8340 fax

katebolger@dwt.com

August 15, 2022

**VIA ECF**

Hon. Sarah L. Cave  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, NY 10007-1312

**Re: Consent Letter-Motion for Extension of Time for the Parties to File Joint Discovery Status Report in *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC (S.D.N.Y.)**

Dear Magistrate Judge Cave:

We represent Cable News Network, Inc. (“CNN”) in the above-captioned matter. On behalf of the parties, we respectfully request an extension of the parties’ deadline to file a joint discovery status report (ECF No. 58) from August 16, 2022, to August 23, 2022. The parties request this additional time to further meet and confer on various discovery matters prior to completing the joint discovery status report. Counsel for Plaintiffs has consented to this request.

The parties have not previously requested an extension of time in connection with this joint discovery status report. Thank you for the Court’s consideration of this request.

Respectfully submitted,

/s/ Katherine M. Bolger

Katherine M. Bolger  
Davis Wright Tremaine LLP